

EXHIBIT A

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

CAROL S. MARCELLIN, individually, and as Co-Administrator of the Estate of Charles E. Hollowell, deceased, and JESSICA HOLLOWELL-McKAY, as Co-Administrator of the Estate of Charles E. Hollowell, deceased,

Plaintiffs,

v.

HP, INC., and STAPLES, INC.,

Defendants.

Civ. No. 1:21-cv-00704-JLS

DECLARATION OF STEVE MARTIN, Ph.D.

Pursuant to 28 U.S.C. § 1746, I, Steve W. Martin, Ph.D., declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge, information and belief:

1. The statements contained herein are based on my personal knowledge.
2. The statements and information in my *Vita* (Dkt. 66-5) are accurate and true.
3. The statements and information in my report (Dkt. 66-5) and rebuttal report (Dkt. 66-16) are accurate and true.
4. I have 40+ years of experience in computer programming, including taking formal courses. I programmed computers in graduate school to collect and analyze data as part of my research in materials science and engineering, including programs that included tens of thousands of lines of code.
5. In my current research, I regularly program excel spreadsheets, and I have taught courses (e.g., “Problems in Material Sciences”) where students wrote technically oriented programs to analyze data.

6. As described in my deposition, I have written communications protocols using the IEEE 488 bus, which requires an elaborate “handshake” between the computer and peripheral before initiating communication and control; this is a form of authentication analogous to the authentication protocol’s I discuss in my reports and deposition (e.g., SHA-1).
7. I also regularly deal with communications protocols, and issues of authentication between computers and scientific instruments, such as impedance spectrometers, glove boxes, differential scanning calorimeters, Raman spectrometers, and infrared spectrometers.
8. I use and test batteries daily in my lab, using lithium-ion batteries as a baseline. This includes heating batteries in ovens and measuring temperature rise.
9. I regularly use batteries and their characteristics in my courses and research, including methods for reducing their flammability. A major aspect of my research on batteries is to develop new kinds of batteries that solve the thermal runaway and flammability of lithium-ion batteries.
10. I am knowledgeable through my research and teaching about the insulating properties of various materials, including heat flow, and how heat transfers from a room or space into and through materials. I regularly calculate the rate of temperature change of various materials.
11. As alluded to in my report, the Larsson paper indicates that the time-constants of heat transfer within the oven and the battery surface are different. The batteries in the subject laptop heated up more slowly than in the oven used in the Larsson paper.

DATED: June 9, 2025

/s/ Steve W. Martin
Steve W. Martin